

SEALED

FILED

FEB 12 2019

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

Mark C. McCartt, Clerk
U.S. DISTRICT COURT

UNITED STATES OF AMERICA,

Plaintiff,

v.

FNU LNU,
a/k/a "Lobo,"
ALFREDO HERRERA,
a/k/a "Don Herrera,"
PEDRO PEREZ, JR.,
DOMINGO AGUIRRE,
JAVIER PASSEMENT,
JOSE PEREGRINA-PAEZ,
a/k/a "Guero,"
ARACELI ALVERADO-FELIX,
a/k/a "Tia,"
a/k/a "Guera,"
a/k/a "Lucy,"
a/k/a "Alma,"
XOCHITL DELORES PAEZ-ORTIZ,
MANUEL ORTIZ,
a/k/a "Pelon,"
a/k/a "Manny,"
YOLANDA NICOLE CARTER,
a/k/a "Yoli,"
a/k/a "Yolanda Blair,"
MARIA ARRELLANO,
a/k/a "Lucy,"
CESIAH SANCHEZ,
a/k/a "Cesi,"
a/k/a "Mary,"
JAVIER HERNANDEZ,
a/k/a "Gordo,"

Defendants.

) Case No. 18-CR-00171-CVE

) FILED UNDER SEAL

) SUPERSEDING INDICTMENT

) [COUNTS 1 & 2: 18 U.S.C. §§ 1956(h)

) and 1956(a)(2) - Money Laundering

) Conspiracy;

) COUNT 3: 21 U.S.C. §§ 846 and

) 841(b)(1)(A)(viii) - Drug Conspiracy;

) Forfeiture Allegation: 21 U.S.C.

) § 853(a) - Drug Forfeiture;

) COUNTS 4, 6, 8, & 10: 21 U.S.C. §§

) 841(a)(1) and 841(b)(1)(B)(viii) -

) Distribution of Methamphetamine;

) COUNTS 5, 7, 9, & 11: 21 U.S.C. §§

) 841(a)(1) and 841(b)(1)(B)(viii) -

) Possession of Methamphetamine With

) Intent to Distribute;

) COUNTS 12 & 14: 21 U.S.C. §§

) 841(a)(1) and 841(b)(1)(A)(viii) -

) Distribution of Methamphetamine;

) COUNTS 13, 15, & 16: 21 U.S.C. §§

) 841(a)(1) and 841(b)(1)(A)(viii) -

) Possession of Methamphetamine With

) Intent to Distribute;

) COUNT 17: 21 U.S.C. § 856(a)(1) -

) Maintaining a Drug Involved

) Premises;

) COUNTS 18 through 36: 21 U.S.C.

) § 843(b) - Use of a Communication

) Facility in Committing, Causing and

) Facilitating the Commission of a Drug

) Trafficking Felony]

THE GRAND JURY CHARGES:

COUNT ONE
[18 U.S.C. §§ 1956(h) and 1956(a)(2)]

From as early as in or about April 2018 until the date of this Superseding Indictment, in the Northern District of Oklahoma and elsewhere, the defendants, **FNU LNU**, a/k/a “Lobo,” **ALFREDO HERRERA**, a/k/a “Don Herrera,” **DOMINGO AGUIRRE**, **JAVIER PASSEMENT**, **JOSE PEREGRINA-PAEZ**, a/k/a “Guero,” **MARIA ARRELLANO**, a/k/a “Lucy,” **CESIAH SANCHEZ**, a/k/a “Cesi,” a/k/a “Mary,” knowingly and intentionally combined, conspired, confederated, and agreed together, each with the other, and with others known and unknown to the Grand Jury, to commit the following offenses in violation Title 18, United States Code, Section 1956(a)(2):

- (a) To transport, transmit, and transfer monetary instruments and funds from a place in the United States, that is, Tulsa, Oklahoma, to a place outside the United States, that is, Mexico, with the intent to promote the carrying on of specified unlawful activity, to-wit: distribution of methamphetamine in violation of Title 21, United States Code, Section 841(a)(1); and conspiracy to possess with intent to distribute and to distribute methamphetamine in violation of Title 21, United States Code, Sections 846 and 841(a)(1), violations of Title 18, United States Code, Section 1956(a)(2)(A); and
- (b) To transport, transmit, and transfer monetary instruments and funds from a place in the United States, that is, Tulsa, Oklahoma, to a place outside the United States, that is, Mexico, knowing that the monetary instruments and funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity and knowing that such transportations, transmissions, and transfers were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, to-wit: distribution of methamphetamine in violation of Title 21, United States Code, Section 841(a)(1); and conspiracy to possess with intent to distribute and to distribute methamphetamine in violation of Title 21,

United States Code, Sections 846 and 841(a)(1), violations of Title 18,
United States Code, Section 1956(a)(2)(B)(i).

All in violation of Title 18, United States Code, Sections 1956(h) and 1956(a)(2).

COUNT TWO
[18 U.S.C. §§ 1956(h) and 1956(a)(2)]

From as early as in or about May 2018 until the date of this Superseding Indictment, in the Northern District of Oklahoma and elsewhere, the defendants, **FNU LNU**, a/k/a “Lobo,” **PEDRO PEREZ JR.**, **JOSE PEREGRINA-PAEZ**, a/k/a “Guero,” **ARACELI ALVERADO-FELIX**, a/k/a “Tia,” a/k/a “Guera,” a/k/a “Lucy,” a/k/a “Alma,” **MARIA ARRELLANO**, a/k/a “Lucy,” **CESIAH SANCHEZ**, a/k/a “Cesi,” a/k/a “Mary,” knowingly and intentionally combined, conspired, confederated, and agreed together, each with the other, and with others known and unknown to the Grand Jury, to commit the following offenses in violation Title 18, United States Code, Section 1956(a)(2):

- (a) To transport, transmit, and transfer monetary instruments and funds from a place in the United States, that is, Tulsa, Oklahoma, to a place outside the United States, that is, Mexico, with the intent to promote the carrying on of specified unlawful activity, to-wit: distribution of methamphetamine in violation of Title 21, United States Code, Section 841(a)(1); and conspiracy to possess with intent to distribute and to distribute methamphetamine in violation of Title 21, United States Code, Sections 846 and 841(a)(1), violations of Title 18, United States Code, Section 1956(a)(2)(A); and
- (b) To transport, transmit, and transfer monetary instruments and funds from a place in the United States, that is, Tulsa, Oklahoma, to a place outside the United States, that is, Mexico, knowing that the monetary instruments and funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity and knowing that such transportations, transmissions, and transfers were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, to-wit: distribution of methamphetamine in violation of Title 21, United States Code, Section 841(a)(1); and conspiracy to possess with intent to distribute and to distribute methamphetamine in violation of Title 21,

United States Code, Sections 846 and 841(a)(1), violations of Title 18,
United States Code, Section 1956(a)(2)(B)(i).

All in violation of Title 18, United States Code, Sections 1956(h) and 1956(a)(2).

COUNT THREE
[21 U.S.C. §§ 846 and 841(b)(1)(A)(viii)]

From as early as on or about April 1, 2018, to the date of this Superseding Indictment, in the Northern District of Oklahoma and elsewhere, the defendants, **FNU LNU**, a/k/a “Lobo,” **JOSE PEREGRINA-PAEZ** a/k/a “Guero,” **ARACELI ALVERADO-FELIX**, a/k/a “Tia,” a/k/a “Guera,” a/k/a “Lucy,” a/k/a “Alma,” **XOCHITL DELORES PAEZ-ORTIZ**, **MANUEL ORTIZ**, a/k/a “Pelon,” a/k/a “Manny,” **YOLANDA NICOLE CARTER**, a/k/a “Yoli,” **MARIA ARRELLANO**, a/k/a “Lucy,” **CESIAH SANCHEZ**, a/k/a “Cesi,” a/k/a “Mary,” **JAVIER HERNANDEZ**, a/k/a “Gordo,” together and with others known and unknown to the Grand Jury (collectively “the conspirators”), did willfully, knowingly, and intentionally combine, conspire, confederate, and agree, each with the other, to commit offenses against the United States as follows:

- (a) To possess with intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, a violation of Title 21, United States Code, Section 841(a)(1); and
- (b) To distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, a violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(A)(viii).

DRUG FORFEITURE ALLEGATION
[21 U.S.C. § 853(a)]

The allegations contained in Count Three of this Superseding Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853(a).

Upon conviction of the drug conspiracy alleged in Count Three of this Superseding Indictment, as part of their sentence, the defendants **FNU LNU**, a/k/a “Lobo”, **JOSE PEREGRINA-PAEZ**, a/k/a “Guero,” **PEDRO PEREZ, JR.**, and **ARACELI ALVERADO-FELIX**, a/k/a “Tia,” a/k/a “Guera,” a/k/a “Lucy,” a/k/a “Alma,” shall forfeit to the United States any property constituting, or derived from, proceeds obtained, directly or indirectly, as the result of such conspiracy and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such conspiracy, including, but not limited to:

MONEY JUDGMENTS

A money judgment against Defendant **FNU LNU**, a/k/a “Lobo”, in the amount of at least \$250,000 because such proceeds were obtained by him as a result of the drug conspiracy.

A money judgment against Defendant **JOSE PEREGRINA-PAEZ** a/k/a “Guero,” in the amount of at least \$250,000 because such proceeds were obtained by him as a result of the drug conspiracy.

A money judgment against Defendant **PEDRO PEREZ, JR.** in the amount of at least \$250,000 because such proceeds were obtained by him as a result of the drug conspiracy.

Pursuant to Title 21, United States Code, Section 853(p), the defendants shall forfeit substitute property, up to the value of the property described above if, by any act or

omission of the defendants, the property described above, or any portion thereof, cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

All pursuant to Title 21, United States Code, Section 853(a).

COUNT FOUR

[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(viii)]

On or about May 22, 2018, in the Northern District of Oklahoma, the defendants, **JOSE PEREGRINA-PAEZ** a/k/a “Guero,” **MARIA ARRELLANO**, a/k/a “Lucy,” and others known to the Grand Jury, did knowingly and intentionally distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(viii).

COUNT FIVE

[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(viii)]

On or about May 22, 2018, in the Northern District of Oklahoma, the defendant, **JAVIER HERNANDEZ**, a/k/a “Gordo,” and others known to the Grand Jury, did knowingly and intentionally possess with intent to distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(viii).

COUNT SIX

[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(viii)]

On or about May 23, 2018, in the Northern District of Oklahoma, the defendants, **JOSE PEREGRINA-PAEZ** a/k/a “Guero,” **MARIA ARRELLANO**, a/k/a “Lucy,” and others known to the Grand Jury, did knowingly and intentionally distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(viii).

COUNT SEVEN

[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(viii)]

On or about May 23, 2018, in the Northern District of Oklahoma, the defendant, **JAVIER HERNANDEZ**, a/k/a “Gordo,” and others known to the Grand Jury, did knowingly and intentionally possess with intent to distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(viii).

COUNT EIGHT

[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(viii)]

On or about May 24, 2018, in the Northern District of Oklahoma, the defendants, **JOSE PEREGRINA-PAEZ** a/k/a “Guero,” **MARIA ARRELLANO**, a/k/a “Lucy,” and others known to the Grand Jury, did knowingly and intentionally distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(viii).

COUNT NINE

[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(viii)]

On or about May 24, 2018, in the Northern District of Oklahoma, the defendant, **JAVIER HERNANDEZ**, a/k/a “Gordo,” and others known to the Grand Jury, did knowingly and intentionally possess with intent to distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(viii).

COUNT TEN

[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(viii)]

On or about May 26, 2018, in the Northern District of Oklahoma, the defendants, **JOSE PEREGRINA-PAEZ** a/k/a “Guero,” **MARIA ARRELLANO**, a/k/a “Lucy,” and others known to the Grand Jury, did knowingly and intentionally distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(viii).

COUNT ELEVEN
[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(viii)]

On or about May 26, 2018, in the Northern District of Oklahoma, the defendant, **JAVIER HERNANDEZ**, a/k/a “Gordo,” and others known to the Grand Jury, did knowingly and intentionally possess with intent to distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(viii).

COUNT TWELVE

[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(viii)]

On or about May 26, 2018, in the Northern District of Oklahoma, the defendants, **JOSE PEREGRINA-PAEZ** a/k/a “Guero,” **MARIA ARRELLANO**, a/k/a “Lucy,” and others known to the Grand Jury, did knowingly and intentionally distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii).

COUNT THIRTEEN
[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(viii)]

On or about May 26, 2018, in the Northern District of Oklahoma, the defendant, **YOLANDA NICOLE CARTER**, a/k/a “Yoli,” and others known to the Grand Jury, did knowingly and intentionally possess with intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii).

COUNT FOURTEEN
[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(viii)]

On or about May 27, 2018, in the Northern District of Oklahoma, the defendants, **JOSE PEREGRINA-PAEZ** a/k/a “Guero,” **MARIA ARRELLANO**, a/k/a “Lucy,” and others known to the Grand Jury, did knowingly and intentionally distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii).

COUNT FIFTEEN
[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(viii)]

On or about May 27, 2018, in the Northern District of Oklahoma, the defendant, **JAVIER HERNANDEZ**, a/k/a “Gordo,” and others known to the Grand Jury, did knowingly and intentionally possess with intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii).

COUNT SIXTEEN

[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(viii)]

On or about May 28, 2018, in the Northern District of Oklahoma, the defendants, **FNU LNU**, a/k/a “Lobo,” **JOSE PEREGRINA-PAEZ**, a/k/a “Guero,” and others known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii).

COUNT SEVENTEEN
[21 U.S.C. § 856(a)(1)]

From as early as on or about May 1, 2018, to on or about May 28, 2018, in the Northern District of Oklahoma, the defendants, **FNU LNU**, a/k/a “Lobo,” **JOSE PEREGRINA-PAEZ**, a/k/a “Guero,” and others known and unknown to the Grand Jury, did knowingly use, and cause to be used, a place located at 259 South 104th East Avenue, Tulsa, Oklahoma, for the purpose of distributing methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 856(a)(1) and Title 18, United States Code, Section 2.

COUNTS EIGHTEEN THROUGH THIRTY-SIX
[21 U.S.C. § 843(b)]

On or about the dates listed below, in the Northern District of Oklahoma, the defendants, **FNU LNU**, a/k/a “Lobo,” **JOSE PEREGRINA-PAEZ**, a/k/a “Guero,” **YOLANDA NICOLE CARTER**, a/k/a “Yoli,” **MARIA ARRELLANO**, a/k/a “Lucy,” **CESIAH SANCHEZ**, a/k/a “Cesi,” a/k/a “Mary,” **JAVIER HERNANDEZ**, a/k/a “Gordo,” **PEDRO PEREZ Jr.**, and others known to the Grand Jury, knowingly and intentionally used a communication facility, specifically, a cellular telephone, in committing, causing, and facilitating acts constituting felonies under Title 21, United States Code, Sections 841 and 846, in that the defendants used the telephones to discuss various matters concerning the conspiracy to possess with intent to distribute methamphetamine, a Schedule II controlled substance, as set forth in the chart below:

COUNT	DATE	DEFENDANT(S)	TARGET TELEPHONE and SESSION NO.	DESCRIPTION OF CALLS
18	4/6/2018	FNU LNU , a/k/a “Lobo,”	PASSEMENT TT1 Session #377	Conspirators discussing delivery of money.
19	4/22/2018	FNU LNU , a/k/a “Lobo,”	PASSEMENT TT1 Session #3748	Conspirators arranging delivery of money.

COUNT	DATE	DEFENDANT(S)	TARGET TELEPHONE and SESSION NO.	DESCRIPTION OF CALLS
20	5/22/2018	Jose PEREGRINA and Yolanda CARTER	PEREGRINA TT2 Session #2	Conspirators discussing possible delivery of methamphetamine.
21	5/22/2018	Maria ARRELLANO Yolanda CARTER	PEREGRINA TT2 Session #7	Conspirators discussing possible delivery of methamphetamine.
22	5/22/2018	Jose PEREGRINA Javier HERNANDEZ	PEREGRINA TT2 Session #14	Conspirators discussing possible delivery of methamphetamine.
23	5/22/2018	Jose PEREGRINA Maria ARRELLANO	PEREGRINA TT2 Session #22	Conspirators arranging delivery of money.
24	5/23/2018	Jose PEREGRINA Javier HERNANDEZ	PEREGRINA TT2 Session #28	Conspirators discussing possible delivery of methamphetamine.


COUNT	DATE	DEFENDANT(S)	TARGET TELEPHONE and SESSION NO.	DESCRIPTION OF CALLS
25	5/23/2018	Jose PEREGRINA Maria ARRELLANO	PEREGRINA TT2 Session #42	Updating coconspirator.
26	5/24/2018	Jose PEREGRINA Javier HERNANDEZ	PEREGRINA TT2 Session #82	Confirming arrangements to deliver methamphetamine.
27	5/24/2018	Jose PEREGRINA Maria ARRELLANO	PEREGRINA TT2 Session #85	Conspirators discussing delivery of money.
28	5/26/2018	Jose PEREGRINA Javier HERNANDEZ	PEREGRINA TT2 Session #118	Confirming arrangements to deliver methamphetamine.
29	5/26/2018	Maria ARRELLANO Yolanda CARTER	PEREGRINA TT2 Session #119	Confirming arrangements to deliver methamphetamine.
30	5/27/2018	Jose PEREGRINA Javier HERNANDEZ	PEREGRINA TT2 Session #138	Conspirators discussing arrangements for delivery of methamphetamine.

COUNT	DATE	DEFENDANT(S)	TARGET TELEPHONE and SESSION NO.	DESCRIPTION OF CALLS
31	5/27/2018	Jose PEREGRINA Javier HERNANDEZ	PEREGRINA TT2 Session #143	Confirming arrangements to deliver methamphetamine.
32	5/28/2018	Jose PEREGRINA Yolanda CARTER	PEREGRINA TT2 Session #154	Conspirators discussing arrangements for delivery of methamphetamine.
33	5/28/2018	Cesiah SANCHEZ Yolanda CARTER	PEREGRINA TT2 Session #159	Updating coconspirator.
34	5/28/2018	Pedro PEREZ Jr	PEREGRINA TT1 Session #369	Conspirators discussing delivery of money.
35	5/28/2018	Jose PEREGRINA Cesiah SANCHEZ	PEREGRINA TT1 Session #377	Conspirators discussing delivery of money.
36	5/28/2018	Jose PEREGRINA Pedro PEREZ Jr.	PEREGRINA TT1 Session #379	Conspirators discussing delivery of money.

All in violation of Title 21, United States Code, Section 843(b).

R. TRENT SHORES
UNITED STATES ATTORNEY

A TRUE BILL



JOEL-LYN A. McCORMICK
Assistant United States Attorney

/s/ Grand Jury Foreperson
Grand Jury Foreperson